IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA,

•

Plaintiff, : **CASE NO. 2:20-MJ-288**

MAGISTRATE JUDGE JOLSON

•

LEATHA INEZ SAVAGE,

v.

:

Defendant.

JOINT MOTION FOR EXTENSION OF TIME DURING WHICH INDICTMENT/INFORMATION MUST BE FILED

Now come the parties, through their undersigned attorneys, and jointly move this Court for an order extending the time for the return of an Indictment or Information pursuant to 18 U.S.C. § 3161(b), for sixty (60) days from **Monday**, **April 19**, **2021**, until **Friday**, **June 18**, **2021**. The defendant, Leatha Inez Savage, is aware of her right to a timely filing of an Indictment or Information afforded under 18 U.S.C. § 3161(b) and hereby waives that right for the purposes of this motion.

The parties believe this continuance would best serve the interests of justice and that the time would be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A).

The United States and defense counsel are in discussions regarding the facts and evidence in this case and need additional time to determine if a resolution can be reached prior to presentation to a Grand Jury. The parties are in agreement that a continuance of the time to file an Indictment or Information would best serve the interests of justice, and that the time period from Monday, April 19, 2021 to Friday, June 18, 2021, would be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A).

For these reasons, the parties request an extension of the time of 60 days within which to file Indictment or Information in this case. The new date requested is **Friday**, **June 18, 2021**.

Respectfully submitted,

VIPAL J. PATEL Acting United States Attorney

s/Samuel Shamansky
per telephone authority
SAMUEL SHAMANSKY
523 S. Third Street
Columbus, OH 43215
(614) 242-3939
shamanskyco@gmail.com
Attorney for Leatha Inez Savage

s/Sheila G. Lafferty
SHEILA G. LAFFERTY (0042554)
Assistant United States Attorney
303 Marconi Blvd., Suite 200
Columbus, Ohio 43215
(614) 469-5715
sheila.lafferty@usdoj.gov